

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	
MBMK PROPERTY HOLDINGS, LLC,	:	CHAPTER 11
	:	
Debtor	:	Bankruptcy No. 2:22-bk-13121 (MDC)
	:	
	:	
MBMK PROPERTY HOLDINGS, LLC,	:	Adversary Proceeding No. 23-00062 (MDC)
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
WILMINGTON TRUST, NATIONAL	:	
ASSOCIATION, As Trustee, For	:	
The Benefit of The Holders Of	:	
Corevest American Finance	:	
2018-2 Trust Mortgage	:	
Pass-Through Certificates;	:	
	:	
BAY MANAGEMENT GROUP OF	:	
PHILADELPHIA, LLC;	:	
	:	
JAMES PAUL, d/b/a James Paul	:	
the ALPS Group;	:	
	:	
and	:	
	:	
ALPS GROUP, INC. d/b/a James Paul	:	
the ALPS Group,	:	
	:	
Defendants.	:	
	:	
	:	

**DEFENDANT ALPS GROUP, INC.’S RESPONSE IN OPPOSITION TO PLAINTIFF’S
MOTION FOR RECONSIDERATION AND RELIEF FROM ORDER DENYING
PRELIMINARY INJUNCTION FOR EQUITABLE ACCOUNTING**

Now comes the Defendant ALPS Group, Inc., wrongfully sued as ALPS Group, Inc., d/b/a James Paul the ALPS Group, (“ALPS”), by its Attorney Alan I. Ehrenberg, of the Law firm of

Alan I. Ehrenberg, LLC, appearing *pro hac vice* in this matter, and in response in opposition to Plaintiff's Motion for Reconsideration and Relief From Order Denying Preliminary Injunction and Equitable Accounting, states as follows:

ALPS hereby adopts each and every argument made by James Paul in James Paul's Response to Plaintiff's Motion for Reconsideration and Relief from Order Denying Preliminary Injunction and Equitable Accounting as though full set forth herein.

WHEREFORE, ALPS respectfully requests that Plaintiff's Motion for Reconsideration and Relief from Order Denying Preliminary Injunction and Equitable Accounting be denied with prejudice.

Respectively Submitted,

ALPS Group, Inc., d/b/a James

By: /s/Alan I. Ehrenberg

Appearing *pro hac vice*

Alan I. Ehrenberg, LLC

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